

# **Exhibit 27**

**Transcript of the Testimony of**  
**Karla Perez**

**Date:**

June 16, 2018

**Case:**

STATE OF TEXAS V. UNITED STATES OF AMERICA

Karla Perez

June 16, 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

STATE OF TEXAS, ET. AL. )

PLAINTIFFS, )

V. )

CASE NO. 1:18-cv-00068

UNITED STATES OF AMERICA, )  
ET. AL., )

DEFENDANTS, )

AND )

KARLA PEREZ, ET. AL., )

DEFENDANT-INTERVENORS.)

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ORAL DEPOSITION OF KARLA PEREZ

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1 ORAL DEPOSITION OF KARLA PEREZ, produced as a  
2 witness at the instance of the Plaintiffs and duly  
3 sworn, was taken in the above-styled and numbered  
4 cause on June 16, 2018, from 11:06 a.m. to 1:55 p.m.,  
5 before Mia Cieslar, Certified Shorthand Reporter in  
6 and for the State of Texas, reported by computerized  
7 machine shorthand, at the offices of the Attorney  
8 General, Consumer Protection Division, 808 Travis  
9 Street, Suite 1520, Houston, Texas, pursuant to the  
10 Federal Rules of Civil Procedure and the provisions  
11 stated on the record or attached hereto.

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1 A. Yes.

2 Q. All right. Then the next paragraph says,  
3 There are a lot of obstacles for DACA students.

4 We talked about some of those obstacles,  
5 right?

6 A. Yes.

7 Q. Okay. Know that many DACA -- many of the  
8 DACA recipients she knew in Texas had not even  
9 realized they could participate in the work study  
10 program in the past.

11 Is that the -- does that refresh your  
12 memory about what this article is about?

13 A. A work study program in Texas.

14 Q. Yeah. Do you --

15 A. Means to limit that to -- or exclude  
16 undocumented students.

17 Q. Okay. So what do you know about the work  
18 study program in Texas? Well, let me ask you another  
19 question first.

20 Was this effort one of the efforts in  
21 the 2017 legislative session that you participated in  
22 advocating for or against this particular proposal?

23 A. Yes.

24 Q. Okay. So what do you know about the Texas  
25 work study program?

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1           A.     I know that it is a state program, not  
2     federal which means that DACA recipients who have work  
3     authorization could participate in it because it does  
4     not -- it's not a federal program.

5           Q.     Okay. And what were the efforts in 2017  
6     related to that work study program?

7           A.     There wasn't a -- an effort to require that  
8     students participating in the state work study program  
9     would qualify for federal financial aid which means  
10    not undocumented students, including those who are  
11    DACA recipients.

12          Q.     Okay. You advocated against that proposal;  
13    is that right?

14          A.     Yes.

15          Q.     And why did you advocate against that  
16    proposal?

17          A.     It's a state work program, it's not a federal  
18    work program. And it didn't make sense to me. It --  
19    it -- it seemed to me just another opportunity to  
20    exclude DACA recipients from a program that they could  
21    otherwise participate in because -- for those who have  
22    work authorization. And it also was quite evident to  
23    me that the legislature -- the legislator who  
24    sponsored this proposal did not understand the nuances  
25    of -- of this.





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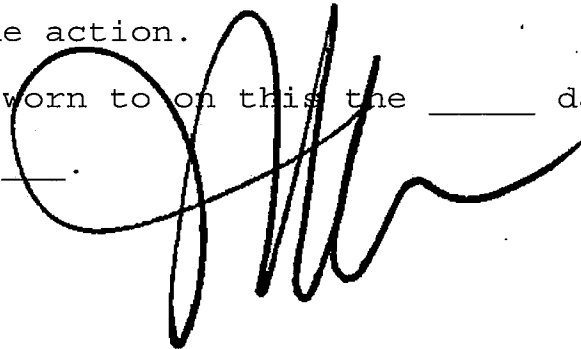
1           \_\_X\_\_ was requested by the deponent or a party  
2 before the completion of the deposition and returned  
3 within 30 days from date of receipt of the transcript.  
4 If returned, the attached Changes and Signature Page  
5 contains any changes and the reasons therefor;

6           \_\_\_\_\_ was not requested by the deponent or a  
7 party before the completion of the deposition.

8           I further certify that I am neither attorney  
9 nor counsel for, related to, nor employed by any of  
10 the parties in the action in which this testimony was  
11 taken.

12           Further, I am not a relative or employee of  
13 any attorney of record in this cause, nor do I have a  
14 financial interest in the action.

15           Subscribed and sworn to on this the \_\_\_\_\_ day  
16 of \_\_\_\_\_, 20\_\_\_\_.



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